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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEORGE WASHINGTON SIMS, III,

Defendant.

Case No.: 2:21-cr-00026-GMN-BNW

**Amended Government's Emergency
Motion for Order Compelling Testimony
Under Immunity**

The United States of America, by and through the undersigned, respectfully moves for an Order to the provisions of 18 U.S.C. § 6001, *et seq.*, compelling the material witness Charlotte Holly to give testimony and provide other information at a Rule 15 deposition and at trial regarding the investigation into sex trafficking by George Washington Sims, III.

1. Pursuant to The Organized Crime Control Act of 1970, as codified in 18 U.S.C. § 6001, *et. seq.*, the United States, with the approval of the designated Deputy Assistant Attorney General, may move this Court for an Order compelling the testimony of a witness who has refused, or will refuse, to testify on the basis of her privilege against self-incrimination.

2. No testimony or other information compelled under such an order (or any information directly or indirectly derived from such testimony or other information) may be used against this witness in any criminal case, except the prosecution for perjury, giving false statement, or otherwise to comply with the Order.

3. Ms. Holly has been subpoenaed to testify at the trial of George Washington Sims, III. She is currently in custody and has requested that her testimony be secured by a Rule 15 deposition. Ms. Holly has indicated her intent to invoke her right against self-incrimination under the Fifth Amendment and refuse to testify.

4. On August 21, 2021, Acting Deputy Assistant Attorney General Amanda N. Liskamm approved and authorized the United States Attorney's request for immunity for Ms. Holly, it being the judgement of the United States that the testimony from Ms. Holly may be necessary to the public interest. Acting Deputy Assistant Attorney General Liskamm's letter is appended hereto as Exhibit 1. The United States represents that Acting Deputy Assistant Attorney General Liskamm was designated by the Attorney General of the United States, pursuant to the Organized Crime Control Act of 1970, to approve such requests for compulsion orders.

DATED this 1st day of September, 2021.

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Bianca R. Pucci

BIANCA R. PUCCI
LISA C. CARTIER-GIROUX
Assistant United States Attorneys
Attorneys for the United States

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GOVERNMENT'S EXHIBIT LIST

- Letter from Acting Deputy Assistant Attorney General

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEORGE WASHINGTON SIMS, III,

Defendant.

Case No.: 2:21-cr-00026-GMN-BNW


Order

This matter coming on the United States' Motion for an Order compelling testimony under a grant of immunity, the premises therein having been considered, and good cause showing, the Court finds that Sharlotte Holly has refused, or will refuse, to testify or provide other information on the basis of her privilege against self-incrimination; and that pursuant to The Organized Crime Control Act of 1970, Acting Deputy Assistant Attorney General Amanda N. Liskamm has approved the United States Attorney's request for immunity, it being the judgment of the United States that the testimony from Sharlotte Holly may be necessary to the public interest.

THEREFORE, IT IS HEREBY ORDERED THAT: In accordance with the Organized Crime Control Act of 1970, 18 U.S.C. § 6001 *et seq.*, Sharlotte Holly shall give testimony or provide other information at the Rule 15 deposition, at trial, and at any other related proceedings, and that no testimony or other information given by Sharlotte Holly pursuant to this Order or any information directly or indirectly derived from such testimony or other

1 information, may be used against her in any criminal case, except a prosecution for perjury,
2 giving a false statement, or otherwise failing to comply with the Order.

3 DATED this 2 day of September, 2021

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6 Gloria M. Navarro, District Judge
7 UNITED STATES DISTRICT COURT
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U.S. Department of Justice

Criminal Division

Office of the Assistant Attorney General

Washington, D.C. 20530

AUG 31 2021

Mr. Christopher Chiou
Acting United States Attorney
District of Nevada
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, NV 89101

Attention: Bianca R. Pucci
Assistant United States Attorney

Re: *United States v. George Washington Sims, III*

Dear Mr. Chiou:

Pursuant to the authority vested in me by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a), I hereby approve your request for authority to apply to the United States District Court for the District of Nevada for an order, pursuant to 18 U.S.C. §§ 6002-6003, requiring Sharlotte Holly to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that she refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amanda N. Liskamm", is written over a horizontal line.

Amanda N. Liskamm
Acting Deputy Assistant Attorney General